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October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St.SW
Washington DC 20204

Statement of Nutritional Support- **PHYTONUTRIENT COMPLEX**
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as: **PHYTONUTRIENT
COMPLEX**

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr.
Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made:
"Phytonutrients are plant nutrients that are important for
health. The active ingredients from a variety of plants have been
extracted and combined in this dietary supplement. The
ingredients have been specially chosen to support the functional
systems of the body."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: **PHYTONUTRIENT COMPLEX**
- 5) Substantiation information on file at the company office. The
corporate officer who can certify same is Dr. Doug Metz, Vice
President.

Yours truly,

A handwritten signature in dark ink, appearing to read "Doug Metz". The signature is fluid and cursive, with a large initial "D" and "M".

Dr. Doug Metz
Vice President

97S-0162

8989 Rio San Diego Dr., Suite 250, San Diego, CA 92108 • Phone 619/297-8100 • Fax 619/209-6236

LET2495

Phytonutrients Complex

Description:

Phytonutrients are plant nutrients that are important for health. The active ingredients from a variety of plants have been extracted and combined in this dietary supplement. The ingredients have been specially chosen to support the functional systems of the body.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Cranberry juice extract (Vaccinium macrocarpon dried juice std 90% juice solids)	25mg	*
Rale	10mg	*
Hawthorn berry (Crataegus cuneata fruit std 5% vitamin flavonoids)	150mg	*
Oat grass	100mg	*
Rice protein concentrate	100mg	*
American ginseng extract (Panax quinquefolius root, 4:1)	40mg	*
Spinach	50mg	*
Tumeric extract (Curcuma longa root std 95% curcuminoids)	100mg	*
Luiniip	10mg	*
Wheat sprouts	150mg	*
Wheat grass	75mg	*
Guar gum	200mg	*

Other Ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide

*Daily Value not established

Phytonutrient Complex is free of corn, dairy, sucrose, starch, salt and yeast

Directions For Use: Take 3 tablets 1 time per day

Storage: Keep tightly closed in a cool, dry place

Caution/Warning: As with any supplement, herb or medication, do not use if while pregnant or lactating, or provide it to a child without consulting a physician

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you feel while taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

Botanene® is a registered trademark of Henkel Corp

DISTRIBUTED BY AMERICAN SPECIALTY HEALTH & WELLNESS™
PO BOX 509040, SAN DIEGO, CA 92150 9040



PHYTONUTRIENT COMPLEX

DIETARY SUPPLEMENT



90 TABLETS

Premium Products for Your Health & Wellness™

Supplement Facts

Serving Size: 3 Tablets	Servings Per Container: 30		
	Amount Per Serving	% Daily Value	
Vitamin E (as d, alpha-tocopherol succinate)	30 IU	100%	
Parsley leaf	50mg	*	
Fruito oligosaccharides	750mg	*	
Inulato	50mg	*	
Milk thistle extract (Silybum marianum seed std 80% silymarin)	50mg	*	
Grape seed extract (Vitis vinifera seed std 95% proanthocyanidins)	10mg	*	
Ginkgo biloba extract (Ginkgo biloba whole plant std 10% terpenes)	20mg	*	
Ginkgo extract (Ginkgo biloba leaf std 24% flavones, 6% terpene lactones)	70mg	*	
Licorice root extract (Glycyrrhiza uralensis root 4:1)	50mg	*	
Astragalus extract (Astragalus membranaceus root std 16% astragalosides)	40mg	*	
Barley sprouts	100mg	*	
Barley grass	50mg	*	
Citrus bioflavonoids	100mg	*	
Carrot	50mg	*	
Broccoli	50mg	*	
Green tea extract (Camellia sinensis leaf std 90% polyphenols)	25mg	*	
Garlic, deodorized (Allium sativum bulbs)	50mg	*	
Acerola berry extract (Malpighia glabra berry, 4:1)	50mg	*	
Alfalfa grass	100mg	*	
Apple pectin	300mg	*	
Botanene® mixed carotenoids (Dunaliella salina, whole plant)	1mg	*	
Brussel sprouts	50mg	*	
Cat's claw extract (Uncaria tomentosa bark, 4:1)	10mg	*	
Chlorella	50mg	*	
Chlorella (cracked cell)	200mg	*	